UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA JOHNSTOWN DIVISION

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IN RE: Joan L. Serena		
	Debtors(s)	
Toyota Motor Credit Corporation	` `	BK NO. 18-70641-JAD
·	Movant	
v.		CHAPTER 13
Joan L. Serena		
	Respondent	
and		
Ronda J Winnecour		
	Additional Respondent	

NOTICE OF MOTION WITH RESPONSE DEADLINE ON MOTION OF TOYOTA MOTOR CREDIT CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than **October 26, 2020** (*i.e.*, seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at www.pawb.uscourts.gov.

If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held.

Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled. You should take this Notice and the Motion to a lawyer at once.

A telephonic hearing will be held on **November 13, 2020** at **11:00 a.m.** before the Honorable Jeffrey A Deller. Parties wishing to appear telephonically must register (and pay the regular charge) with CourtCall at (866) 582-6878 no later than twenty-four (24) hours prior to the scheduled hearing. All counsel and parties participating telephonically shall comply with the procedures of telephonic participation set forth in the procedures for Jeffrey A Deller's cases, which may be found on the Court's webpage at www.pawb.uscourts.gov.

Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

/s/ Fred W. Freitag, IV, Esquire

By: Fred W. Freitag, IV, Esquire ffreitag@leopoldassociates.com Attorney ID No. 61770 Leopold & Associates, PLLC 80 Business Park Drive, Suite 110 Armonk, New York 10504 (914)-219-5787 Attorney for Movant